

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TZIVA RAPOPORT-HECHT, MAGGIE
TSAN, and ERICA WILDSTEIN,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SEVENTH GENERATION, INC.,

Defendant.

No. 7:14-cv-09087-KMK

**PLAINTIFFS' NOTICE OF MOTION
FOR PRELIMINARY APPROVAL OF
SETTLEMENT, PRELIMINARY
CERTIFICATION OF SETTLEMENT
CLASS, AND APPROVAL OF NOTICE
PLAN**

PLEASE TAKE NOTICE THAT, pursuant to Rules 7(b) and 23 of the Federal Rules of Civil Procedure, the undersigned shall bring an unopposed Motion for Preliminary Approval of the Settlement before this Court on a date and time to be set by the Court. This motion is based upon all files and pleadings in this matter, as well as the Memorandum of Law; the Declaration of Michael R. Reese; the Declaration of Melissa W. Wolchansky; the Declaration of Jeffrey D. Kaliel; the Declaration Jason P. Sultzer; and the exhibits submitted herewith.

Date: July 1, 2016

Respectfully submitted,

THE SULTZER LAW GROUP

By: _____

Jason P. Sultzer
sultzerj@thesultzerlawgroup.com
85 Civic Center Plaza, Suite 104
Poughkeepsie, New York 12601
Telephone: (845) 483-7100
Facsimile: (888) 749-7747

REESE LLP

Michael R. Reese
mreese@reesellp.com
100 West 93rd Street, 16th Floor
New York, New York 10025
Telephone: (212) 643-0500
Facsimile: (212) 253-4272

TYCKO & ZAVAREEI LLP

Jeffrey D. Kaliel
jkaliel@tzlegal.com
2000 L. Street, Northwest, Suite 808
Washington, District of Columbia 20036
Telephone: (202) 973-0900
Facsimile: (202) 973-0950

HALUNEN LAW

Melissa Wolchansky
wolchansky@halunenlaw.com
1650 IDS Center
80 South Eighth Street

Minneapolis, Minnesota 55402

Telephone: (612) 605-4098

Facsimile: (612) 605-4099

Counsel for Plaintiffs and the Proposed Class